

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case: 2:21-cr-20665
Judge: Berg, Terrence G.
MJ: Altman, Kimberly G.
Filed: 11-02-2021 At 12:36 PM
INDI USA VS SUMMERLIN (DP)

v.

VIO: 18 U.S.C. § 1591
21 U.S.C. § 856
18 U.S.C. § 922(g)(1)

Quiyemabi Summerlin,
Defendant.

_____ /

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

A woman, Adult Victim Eight, whose identity is known to the Grand Jury, was the victim of the crime alleged in Counts One and Two. Adult Victim Eight was a resident of the Eastern District of Michigan and was over the age of eighteen.

A woman, Adult Victim Nine, whose identity is known to the Grand Jury, was the victim of the crime alleged in Count Three. Adult Victim Nine was a resident of the Eastern District of Michigan and was over the age of eighteen.

A woman, Adult Victim Ten, whose identity is known to the Grand Jury, was the victim of the crime alleged in Count Four. Adult Victim Ten was a resident of the Eastern District of Michigan and was over the age of eighteen.

COUNT ONE

18 U.S.C. § 1591(a)(1) — *Sex trafficking by force, fraud, or coercion*

From on or about October 12, 2019, through on or about October 21, 2019, in the Eastern District of Michigan, the defendant, QUIYEMABI SUMMERLIN, knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means Adult Victim Eight, knowing, and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means would be used to cause Adult Victim Eight to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

COUNT TWO

18 U.S.C. § 1591(a)(1) — *Sex trafficking by force, fraud, or coercion*

From on or around February 2020, through in or around March 2020, in the Eastern District of Michigan, the defendant, QUIYEMABI SUMMERLIN, knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means Adult Victim Eight, knowing, and in reckless disregard of the fact that means of force,

threats of force, fraud, and coercion, and any combination of such means would be used to cause Adult Victim Eight to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

COUNT THREE

18 U.S.C. § 1591(a)(1) — *Sex trafficking by force, fraud, or coercion*

From on or about October 30, 2020, through on or about October 14, 2021, in the Eastern District of Michigan, the defendant, QUIYEMABI SUMMERLIN, knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means Adult Victim Nine, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means would be used to cause Adult Victim Nine to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

COUNT FOUR

18 U.S.C. § 1591(a)(1) — *Sex trafficking by force, fraud, or coercion*

From on or about and between October 11, 2021, through on or about October 14, 2021, in the Eastern District of Michigan, the defendant, QUIYEMABI SUMMERLIN, knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means Adult Victim Ten, knowing and in reckless disregard of the fact that means

of force, threats of force, fraud, and coercion, and any combination of such means would be used to cause Adult Victim Ten to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

COUNT FIVE

21 U.S.C. § 856 — *Maintaining a drug premises*

From on or about October 12, 2019, through on or about October 14, 2021, in the Eastern District of Michigan, the defendant, QUIYEMABI SUMMERLIN, did unlawfully and knowingly use and maintain a place located at 19151 Berden, Detroit, Michigan, for the purpose of distributing and using a controlled substance, in violation of 21 U.S.C. § 856(a)(1).

COUNT SIX

18 U.S.C. § 922(g)(1) — *Felon in Possession of a Firearm*

On or about October 14, 2021, in the Eastern District of Michigan, QUIYEMABI SUMMERLIN, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, one Stevens Arms Company 12-gauge shotgun, Model 620, said firearm having been shipped and transported in interstate and foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

FORFEITURE ALLEGATION

18 U.S.C. § 1594, 21 U.S.C. § 853, 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c) -
Criminal forfeiture

The allegations contained in Counts One through Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 1594, 21 U.S.C. § 853, and 18 U.S.C. § 924(d) together with 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendant, QUIYEMABI SUMMERLIN, shall forfeit to the United States of America (1) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, and any property traceable to such property. The forfeiture in this case may include entry of a forfeiture money judgment.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 856, the defendant, QUIYEMABI SUMMERLIN, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Upon conviction of the offense set forth in Count Six of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the knowing commission of the offenses, including but not limited to, one Stevens Arms Company 12-gauge shotgun, Model 620, and any ammunition contained within the firearm.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeit substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA MOHSIN
Acting United States Attorney

s/Benjamin Coats
Benjamin Coats
Assistant United States Attorney
Chief, Major Crimes Unit

s/Sara D. Woodward
SARA D. WOODWARD
Assistant United States Attorney

s/Tara Hindelang
TARA HINDELANG
Assistant United States Attorney

November 2, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TMH

Case Title: USA v. Quiyemabi Summerlin

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 21-mj-30485]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

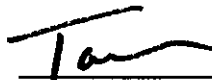
Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 2, 2021
Date


 Tara Hindelang
 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.